

EX PARTE OR LATE FILED



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DOCKET FILE COPY ORIGINAL

April 14, 1995

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Washington, DC 20554

RE: *Ex Parte* Filing - CC Docket No. 92-256 (GTE ONA)

Dear Mr. Caton:

The following responses and materials were presented by Mike Drew of GTE to Ms. Rose Crellin today in the above matter during a meeting at the GTE Washington Office.

1. Provide reports listed in Paragraph 33 of GTE's ONA Order which were not included in GTE's ONA Plan filing. (Subparagraph letters shown below.)

a. New ONA service requests from ESPs and ONA service requests that were previously deemed technically infeasible.

Answer. As noted in Section III.D., Page 10, footnote 12 of GTE's ONA Plan, GTE has not received any completed ONA new service requests and thus has nothing to report at this time.

b. SS7, ISDN, and IN projected deployment in terms of percentage of access lines served system-wide and on a market-area basis.

Answer. **Attachment A** contains GTE's initial 3-year Deployment Report for Intelligent Network, SS7, and ISDN. The report is segregated by State, MSA, Non-MSA (blank headers), and System-wide categories.

d. Progress on the efforts in the IILC on continuing activities for the implementation of service-specific and long-term uniformity issues.

Answer. As noted in Section III.C of GTE's ONA Plan, GTE has participated in the IILC since 1987. **Attachment B** provides a listing of IILC issues and their current status. Most of the issues that have been examined over the past 2 years have been specific ONA service requests from ESPs. These requests have been examined under the IILC's "Systematic Approach to Uniformity of ONA Services" process. The IILC recommends that ESPs with an identified need for the service utilize the final issue documentation as a guide when requesting the capability from individual LECs. This process will assist the ESP in obtaining the capability in a uniform manner.

GTE has actively participated in the resolution of uniformity issues in the past and will continue to do so.

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1. (Continued)

e. Progress In Providing Billing information.

Answer. As noted in Section III.C., Page 9, footnote 7 of GTE's ONA Plan, GTE will provide the following ONA services that will provide network information that may be useful to ESPs in billing their customers: (A "New Request" form is being revised.)

- Called Directory Number Delivery via DID
- Calling Billing Number Delivery - FG B Protocol
- Calling Billing Number Delivery - FG D Protocol
- Calling Directory Number Delivery - via ICLID
- Message Desk ("SMDI")
- Call Detail Recording Reports - Packet

f. OSS services.

Answer. GTE has yet to see any market demand for "direct" access to OSS as was discussed in Section V.B., Pages 18-20, of GTE's ONA Plan. GTE's enhanced services personnel currently use the same "form of access" for ordering and repair of network services that is provided to unaffiliated ESPs. If GTE decides to provide "direct" access to OSS for its ESP, or if requests from unaffiliated ESPs meet the Commission's assessment criteria for ONA services, then GTE will develop, provision, and tariff such access in accordance with the CEI principles addressed in GTE's ONA Plan.

g. List of BSEs used in the provision of GTE's own enhanced services. (GTE may need a waiver for services not to be federally tariffed.)

Answer. GTE currently uses the following BSEs for the provision of its enhanced services:

- Message Desk (SMDI)
- Message Waiting Indicator - Activation (Audible)
- Multiline Hunt Group - Uniform Call Distribution Line Hunting
- Multiline Hunt Group - UCD with Queuing
- Three Way Call Transfer
- Uniform 7 Digit Access Number - Remote Call Forwarding
- Message Waiting Indicator - Activation (Audible Ring Burst)

i. Data regarding state and federal tariffs.

Answer. This report is generated from the ONA Services User Guide Tariff Reference Section. **Attachment C** reflects the format of the report (as filed September 30, 1994 by BellSouth in their September 30, 1994 semi-annual report). GTE's initial ONA Services User Guide will be published in January 1996, due to the delay in the filing of GTE's federal and state ONA tariffs. Thus, GTE's ability to generate this report from the ONA Services User Guide will not be available until January 1996. GTE will file it's report with the first semi-annual tariff report to be filed by March 30, 1996. This delay was granted in the Commission's CC Docket 92-256, Memorandum Opinion and Order, para. 25, released April 3, 1995.

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1. (Continued)

j. ONA Services User Guide.

Answer. GTE's ONA Services User Guide is currently under development and not available. Information contained within the Tariff Reference Section of GTE ONA Services User Guide will be based upon effective federal and state ONA Services tariffs. Since the tariff filings have been delayed from the original due dates, GTE's first semi-annual publication of the ONA Services User Guide is now planned for January 31, 1996 (concurrently with the RBOCs). Due to timing of the ONA tariffs becoming effective, the federal ONA tariff reference information should be available but the state ONA tariff reference information may not be available. The state ONA tariffs are to be filed by January 2, 1996 and will most likely not be in effect at time of publication. For the state tariff reference information where the tariffs are not in effect at time of publication, the state tariff reference will reflect that the service is "Not Tariffed". The next publication of the GTE ONA Services User Guide in July 1996 will reflect updated information based upon effective state tariffs. The wire center ONA services capability information will be provided, which will be of use to ESPs for their planning even though the service may not be tariffed as an ONA service.

A copy of GTE's ONA Services User Guide will be filed with the first semi-annual tariff report due by March 30, 1996. This delay was granted in the Commission's CC Docket 92-256, Memorandum Opinion and Order, para. 25, released April 3, 1995.

k. Other updated information in the areas of ESP requests, GTE responses, and services offered.

Answer. As noted in Section III.D., Page 10, footnote 12 of GTE's ONA Plan, GTE has not received any completed ONA new service requests and thus has nothing to report at this time.

2. *Provide revised CPNI Polling letter for the 2-20 line business customers, plus the sample notification for the greater than 20 line customers (A draft of the pre-notification message will be provided shortly.)*

Answer. GTE's sample CPNI letter, which was filed in GTE's ONA Plan, has been revised. GTE will send separate notifications to business customers with 2-20 lines and those business customers with greater than 20 lines. GTE will send separate notifications so that these customers will be clear as to how CPNI may or may not be used by GTE.

Attachment D contains copies of both notifications and associated response forms.

For the business customers with 2-20 lines, the customer has the right to restrict GTE access to their CPNI for the marketing of enhanced services. For those business customers with greater than 20 lines, the customer must explicitly give GTE permission to access their CPNI for the marketing of enhanced services. Due to this major change in the way GTE must deal with the business customer with greater than 20 lines, GTE will also send a pre-notification to these customers to inform them of the upcoming notification and the potential impacts

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GTE also revised the language in its cover letter and notification form, to be consistent with letters and forms previously approved by the FCC for the RBOCs. GTE has also added a restriction timeframe option for less than one year as well as specific information that can be restricted by the customer. GTE cannot restrict certain telephone numbers within the account, thus there is no language to that effect.

3. Description of how GTE will meet RBOC requirements discussed in 6 FCC Rcd 7646, Paragraph 47.

"47. In the BOC Amendment Order we stressed the importance of providing ESPs access to OSS functions. The BOCs have continued to provide such access indirectly. We agree with MCI and the ONA Users Group that BOC progress in providing ESP access to OSS services has been uneven and some BOCs have not progressed substantially in the provision of ESP access to OSS capabilities. Bell Atlantic, BellSouth, and Pactel, however, have made substantial progress in providing ESP access to OSS services. We expect the BOCs to continue developing methods for ESPs to access BOC OSS capabilities. We require all the BOCs to report annually on their continuing progress in developing and implementing methods for ESPs to access OSS service. Because Ameritech, NYNEX, SWBT, and US West have not thus far demonstrated substantial progress in providing ESP access to OSS services, we will be examining their reports with a heightened level of scrutiny."

Answer. GTE has no current plans to develop "direct" access to Operations Support Systems (OSS) due to lack of demand. Of the \$20 million original estimate by GTE to implement the ONA requirements and nondiscrimination safeguards, approximately \$16 million of this related to the development of "direct" access to OSS. The Commission's BOC ONA Amendment Reconsideration Order clarified the OSS requirements, and GTE is in compliance with paragraph 6 of that Order. This compliance, as recognized by the Commission in Paragraph 22 of GTE's ONA Order, reduced GTE's estimated implementation costs substantially and supported the Commission's decision to apply the ONA requirements to GTE. If GTE decides to provide "direct" access to OSS for its ESP, or if requests from unaffiliated ESPs meet the Commission's assessment criteria for ONA services, then GTE will develop, provision and tariff such access.

Procedures will be developed to safeguard proprietary information in the non-disclosure agreements with ESPs in accordance with Paragraph 55 of the Order [6 FCC Rcd 7646].

4. Copies of federal and state illustrative tariff pages.

Answer. **Attachment E** contains copies of the illustrative federal GTE Telephone Operations (GTOC) and GTE System Telephone Companies (GSTC) ONA tariff pages. Also included is the illustrative state ONA tariff pages for Arkansas which shows the model for the mirroring of the federal tariff in all state jurisdictions.

A copy of the illustrative state tariff will be provided to the attorneys for the State of Hawaii, with a copy of the transmittal letter provided to Ms. Rose Crellin.

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Two copies of this Notice are hereby filed with the Secretary of the Commission in accordance with Section 1.1206(a)(2) of the Rules. Please include this letter in the record of this proceeding.

I may be reached at (202) 463-5293 if further information is needed.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ed Shimizu', with a stylized flourish extending from the end.

Ed Shimizu
Director -Regulatory Matters

C: Ms. Rose Crellin

Attachments

DOCUMENT OFF-LINE

This page has been substituted for one of the following:

o An oversize page or document (such as a map) which was too large to be scanned into the RIPS system.

o Microfilm, microform, certain photographs or videotape.

✓ Other materials which, for one reason or another, could not be scanned into the RIPS system. *ATTACHMENTS AS DESCRIBED BELOW*

The actual document, page(s) or materials may be reviewed by contacting an Information Technician. Please note the applicable docket or rulemaking number, document type and any other relevant information about the document in order to ensure speedy retrieval by the Information Technician.

A - DEPLOYMENT REPORT

B - IILC ISSUES

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D - FORMS

E - TARIFF PAGES